

# **EXHIBIT 8**

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**By Electronic Mail**

Nathan Cox  
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**Re: WSOU Investments LLC v. Google LLC, No. 20-580 (W.D. Texas)**

Dear Nathan:

I write in response to WSOU's emails of yesterday evening and this morning regarding documents Google produced in June and July 2021. On June 29, 2021, we produced in this matter documents bearing Bates Numbers GOOG-WSOU580-00003072 to GOOG-WSOU580-00003167; on July 14, 2021, we produced documents bearing Bates Numbers GOOG-WSOU580-00003168 to GOOG-WSOU580-00011427. In both our production letters, we noted that, "unless we hear otherwise from you, we will take the FTP site down in a week."

We heard nothing from WSOU regarding these productions until yesterday evening, when you asked us to "please reactivate the production links" to these documents. This morning, Roman Jackson of DataPlus Consulting confirmed that WSOU was "missing the productions bates ranges" for these productions. The only conclusion we can draw from these events is that WSOU failed to download these productions, and failed to notice its failure until yesterday. If this conclusion is incorrect, please let us know how so.

As you also know, WSOU has sent several letters demanding additional document production in this matter, including letters dated September 22, 2021, October 14, 2021, and January 7, 2022, even though WSOU did not download, let alone review, Google's production in this matter before sending those letters. Of the over 2,700 documents Google has produced in this action, the two productions WSOU apparently failed to download or review comprise nearly 1,000 documents—over one-third of Google's document production in this matter.

We trust that this failure will not recur. To the extent that WSOU has similarly failed in other matters, we further trust that WSOU will complete its review of all documents Google has produced before communicating further with Google concerning document discovery, and we will understand any further communications regarding discovery as confirming that WSOU's review of Google's production is complete. Please let us know in the unlikely event that we should understand WSOU's future communications differently.

Nathan Cox  
January 20, 2022  
Page 2

With this prologue, we are happy to extend you the courtesy of reproducing these documents. Google's production of June 29, 2021, containing documents bearing Bates Numbers GOOG-WSOU580-00003072 through GOOG-WSOU580-00003167 is available as follows:

URL: ftp://warrenlex.com  
Userid: 2022-01-20-580  
Password: 6E97SI]\_3T&f


Google's production of July 14, 2021, containing documents bearing Bates Numbers GOOG-WSOU580-00003168 through GOOG-WSOU580-00011427 is available as follows:

URL: ftp://warrenlex.com  
Userid: 2022-01-20-580.2  
Password: )+I^V~v1hv5e

Again, please note that some of these documents contain Restricted – Attorneys' Eyes Only under the protective order governing confidentiality in this matter (Docket No. 52). For security and confidentiality, we have encrypted these productions using VeraCrypt, free encryption software that you can download from <https://www.veracrypt.fr/>. The decryption passwords will follow in a separate email.

As before, unless we hear otherwise from you, we will take the FTP site down in a week. Thank you for your continued time and courtesy in this matter.

Very Truly Yours,



Erika H. Warren